February 16, 2007

Mr. Matthew A. Love Exide Corporation 3000 Montrose Avenue Reading, PA 19605

Dear Mr. Love:

RE: Termination of Interim Status
Exide Technologies-Manchester
Manchester, Iowa
EPA RCRA ID No. IAD069619765

This letter is to inform you of the U.S. Environmental Protection Agency's (EPA's) decision to terminate interim status and deny the Permit Application in accordance with Title 40 Code of Federal Regulations (CFR) 265.1(b) and 40 CFR 270.73. The EPA is also proposing that no further corrective action is necessary at the Exide Technologies, Manchester, Iowa facility based on currently known information. The foregoing decisions are based on the following:

Closure of the former surface impoundment was completed by the facility pursuant to the submitted closure plan, dated January 16, 1987 which was approved by EPA May 15, 1987. Closure certification was not accepted by EPA initially because of the possibility of underlying groundwater contamination which required post-closure care after the surface impoundment was removed. Seven years of groundwater monitoring based on time-of-travel calculations had shown no groundwater contamination by hazardous waste or hazardous waste constituents. Therefore, the Closure Certification dated June 14, 1993 was accepted by EPA. No other SWMUs (Solid Waste Management Units) or areas of contamination were present on the facility property that required investigation.

As required by 40 CFR 124.9(b)(2), an Administrative Record was assembled and made available for public comment at the Manchester Public Library (304 N. Franklin Street) for a period of 45 days as specified under 40 CFR 124.10(b)(1), denial of RCRA permit requirements. In addition, EPA published a notice as specified by 40 CFR 124.10(b)(1) in the Manchester Press announcing a 45 day public comment period on EPA's proposed interim status termination and no further corrective action determination for the facility. The public was invited to review and comment on the proposed decisions to release of the facility's interim status and no further corrective action during the public comment period. No comments were received by EPA during the public comment period.

RCAP

RCAP

**GABBERT** 

**SLUGANTZ** 

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515461 RCRA Since the surface impoundment has been removed, and no hazardous waste constituents were found during seven years of monitoring immediately adjacent to or underneath the hazardous waste unit, EPA believes that post-closure has been completed in accordance with the approved plan. Therefore in accordance with Title 40 Code of Federal Regulations (CFR) 265.145, you are no longer required to maintain post-closure cost assurance for this facility, as required by Subpart H of 40 CFR part 265. The financial quarantee bond Number 400JT6546 issued by St. Paul Fire and Marine Insurance Company and letter of credit Number DBS-15876 issued by Deutsche Bank have been returned, and the trustee of the standby trust agreement will be requested to terminate it upon receipt of address instructions.

If you have any questions, please contact Harry Gabbert of my staff at (913) 551-7652.

Sincerely,

Lynn Slugantz, Chief Corrective Action and Permits Branch Air, RCRA, and Toxics Division

bcc:

Howard Bunch

**CNSL** 

ARTD/RCAP:cas:h:/HGABBERT/EXIDEINTTERMINATION.DOC/021507

# RCRA READY FOR ANTICIPATED USE (RAU) **DOCUMENTATION FORM, 2011**

**United States** 

# ENVIRONMENTAL PROTECTION AGENCY

SEPA ELVIRO	Washington, DC 20460		
PART A – GENERAL FACILITY INFORMATION			
1. Facility Name: Exide/General Battery	1. Facility Name: Exide/General Battery 2. EPA ID: IAD069619765		
3. Street Address: 913 South 10 <sup>th</sup> Street			
4. City: Manchester 5. State: IA 6. Zip Code: 52057		6. Zip Code: 52057	
7. Project Manager: Patricia Murrow	7. Project Manager: Patricia Murrow 8. Organization AWMD/WRAP/MIRP		
PART B – READY FOR ANTICIPATED USE DETERMINATION			
9. This RAU Determination is for:			
Facility-wide Designation, Number	of Acres at Facility	22.5 ; or	
Area Designation – Area defined in RCRA INFO as Number of Acres in Area			
10. Protective for People under Current (	Conditions Requirer	ments.	
A Current Human Exposure Under made.	Control Environmen	ntal Indicator (CA 725) determination has been	
Date of Determination: <u>05/26/2009</u>			

11. Cleanup Goals for Media That Affect Land	d Use Have Been Achieved	E	
	ection document or other decision document e land uses have been achieved. (See RCRA		
Love, Exide Corporation, Reading, PA 2) CA400- Remedy Decision, CA550NR – F	tive Action and Permits Branch, EPA Region	on 7 to Mr. Matthew ucted, and CA999NF –	
Documentation may include a construction completer action letter, comfort letter, Interim Measure			
12. Institutional Controls Status			
All acres covered by this RAU form meet institutional controls are necessary, or	t the requirement for unrestricted use for all	media and no	
All institutional controls or other administrative controls (e.g. orders, permit, written agreement) required in the remedy decision document or other decision document(s) have been put in place.			
List any contaminated media and use restrictions on facility or acres being considered for RAU:			
Identify Institutional Controls implemented at the facility (each of these should be entered into RCRAInfo, CA772 event code):			
PART C – SIGNATURE		Albunia de desa	
NOTE: The outcome of this Property Reuse Evaluation does expand, or limit any legal rights, obligations, responsibilities activities and/or any potential harm that might result from renot limited to legal, equitable, or administrative rights. EPA oversee, and/or require environmental response actions in coadditional information has been discovered regarding the corconditions at the facility are no longer protective of human h	s, expectations, or benefits of any party. EPA assume ruse activities. EPA retains any and all rights and authorities specifically retains any and all rights and authorities onnection with the facility, including but not limited to namination or conditions at the facility that indicates	s no responsibility for reuse horities it has, including but it has to conduct, direct, o instances when new or	
13. Project Manager: Patricia Murrow	14 Signature	15. Date 5/15/17	
16. Supervisor Jereny D. Johnson	17. Signature	18. Date 5/15/12	
PART D – REMOVAL OF ACRES FROM RI	EADY FOR ANTICIPATED USE DETE	RMINATION	

19. Retraction of RAU Determination		0	-
RAU Determination retracted for entir	e facility, or		
RAU Determination retracted for area. Area Name Number of acres			
Reason:			
20. Project Manager	21. Signature	:	22. Date
23. Supervisor	24. Signature		25. Date

#### **Documentation of Environmental Indicator Determination**

#### **RCRA Corrective Action** (Final 4/1/09)

#### Migration of Contaminated Groundwater Under Control

#### **Environmental Indicator (EI) RCRIS Code CA750**

Facility Name:

Exide Technologies (Formerly General Battery)

Facility Address: 913 South 10th Street

Manchester, Iowa 52057

Facility EPA ID#: IAD069619765

1. Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC), been considered in this EI determination?

<u>X</u>	If yes- check here and continue with #2 below.
	If no- re-evaluate existing data, or
	If data are not available, skip to #8 and enter "IN" status code.

## Facility Location, Physical Setting, Regulatory History and Hydrogeology

Exide Technologies (Exide), a manufacturer of lead-acid batteries, is located at 913 South 10<sup>th</sup> Street, Manchester, Iowa (Figure 1). The site was formerly owned and operated as Prestolite Battery, Allied Battery, and General Battery, respectively. The facility has been regulated as an interim status hazardous waste and storage facility by virtue of Prestolite Battery's initial filing for a RCRA Hazardous Waste Permit on November 11, 1980. In January 1987, the Exide facility submitted a Closure Plan for the closure of four units. The four units were a Lead Storage Area, Waste Solvent Storage Area, Former Waste Storage Area, and a Surface Impoundment (Figure 2). The Closure Plan was posted for public notice on May 23, 1987 and final approval of the plan was granted by EPA in June 1987. Closure activities for the units included environmental sampling for sulfate, pH, sodium and lead contamination, was performed from May through October, 1988. Closure certification reports were submitted to EPA in December 1988 and February 1989, documenting the results of the closure activities and indicating that no further action was necessary.

In September, 1989, EPA concluded that all of the units had been closed in accordance with the approved Closure Plan except for the Surface Impoundment. EPA determined that



## Page 2 Exide Technologies CA750

time-of-travel groundwater monitoring was needed in order to accept the closure certification of the Surface Impoundment. After removal of the Surface Impoundment, a post-closure monitoring program was initiated. The monitoring well system consisted of three downgradient and two upgradient wells (Figure 3). The monitoring wells were sampled semi-annually for pH, specific conductance, total organic carbon (TOC), total organic halides (TOX), sulfate, lead, sodium and methylene chloride. Results of the 18 semi-annual groundwater sampling events had shown that no detectable concentrations of hazardous waste or hazardous waste constituents were present in the groundwater associated with the Exide former Surface Impoundment.

Quarterly groundwater monitoring for over seven years did not detect any hazardous waste or hazardous waste constituents in any onsite monitoring wells. Lead levels in groundwater and soil sampling from the former surface impoundment were below MCLs and equal to or below reported background levels. Closure Certification was accepted by EPA June14, 1993. After a public comment period, EPA terminated Exide's interim status with no further corrective action.

Other than the units that underwent closure as discussed above, other areas of the plant initially investigated in 1986 and discussed in the January, 1987 Corrective Action Plan, included the waste water treatment plant (WWTP), satellite scrap accumulation barrels, sludge sumps, handling of spent methylene chloride from gluing operations and waste oil collections. Air emission control features such as baghouse dust accumulation drums and a wet scrubber were also investigated for potential hazardous waste releases to the environment and addressed in the 1987 Corrective Acton Plan.

There is no evidence of releases to the environment from these other plant waste handling operations. Discharge from the WWTP is continuous and under a NPDES Permit. Satellite accumulation drums for scrap metal and sump sludge collection are periodically sent offsite to a smelter for recycling. Baghouse dust is accumulated in barrels below the baghouses and sent offsite to be reclaimed. Effluent from the wet scrubber is discharged to the WWTP while spent methylene chloride left over from battery case gluing operations is being sent to the Hydrite Chemical Company for recycling use. Waste oil is periodically drummed and sent offsite for incineration.

# Page 3 Exide Technologies CA750

#### Background

#### **Definition of Environmental Indicators for RCRA Corrective Action**

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures such as reports received, to track changes in the quality of the environment. The EI CA750 evaluated in this determination indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater.

#### Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination (YE status code) indicates that the migration of contaminated groundwater has stabilized, and that monitoring conducted has confirmed that the contaminated groundwater plume has or will not in the future, migrate to such an extent as to be detrimental to human health or the environment.

#### Relationship of EI to Final Remedies

While final remedies remain the long-term objective of the RCRA Corrective Action program, the EI are near-term objectives which are currently being used as measures of performance under the Government Performance and Results Act of 1993 (GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains only to the physical migration of contaminates with groundwater movement. Achievement of this EI does not substitute for other stabilization or final remedy requirements associated with source control of contaminants and the need to restore contaminated groundwater to a usable resource.

## **Duration of Applicability of EI Determinations**

EI Determinations status codes should remain in the RCRIS national database only as long as they remain true. These codes must be changed when the regulatory authorities become aware of contrary information.

2. Is groundwater known or reasonably suspected to be contaminated above appropriately protective levels from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

# Page 4 Exide Technologies CA750

	If yes – continue after identifying key contaminants, citing appropriate levels and referencing supporting documentation.
	X If no – skip to #8 and enter "YE" status code, after citing appropriate levels and referencing supporting documentation to demonstrate that groundwater is not contaminated.
- 10	If unknown – skip to #8 and enter "IN" status code.
monito in the g possibl impour to EPA migrate	Rationale and References: In June, 1998, EPA concluded that Exide Technologies could the semi-annual groundwater monitoring program after evaluation of 18 groundwater bring reports indicating no hazardous waste or hazardous waste constituents were present groundwater downgradient of the former surface impoundment. The potential source of the contaminant migration was removed with closure and removal of the surface andment as documented in the Certification of Completion of Post-Closure Care submitted in October, 1998. Time-of-travel studies showed that any plume present would have ed from the upgradient side of the former impoundment to the downgradient monitoring within the time span of the groundwater monitoring program and completion of sampling.
3.	Has the migration of contaminated groundwater stabilized such that contaminated groundwater is expected to remain within the existing area of contaminated groundwater as defined by the monitoring locations designated at the time of this determination?
	If yes – continue, after presenting or referencing the physical evidence and rationale why contaminated groundwater is expected to remain within the dimensions of the existing area of groundwater contamination.
	If no – skip to #8 and enter "NO" status code, after providing an explanation.
	If unknown – skip to #8 and enter "IN" status code.
4.	Does contaminated groundwater discharge into surface water bodies?
	If yes – continue after identifying potentially affected surface water bodies.

# Page 5 Exide Technologies CA750

	If no – skip to #7 and enter "YE" status code after providing an explanation and/or referencing documentation supporting that groundwater contamination does not enter surface water bodies.
	If unknown – skip to #7 and enter "IN" status code.
5.	Is the discharge of contaminated groundwater into surface water likely to be insignificant and there is no other conditions which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations'
	If yes – skip to #7 and enter "YE" status code in #8 if #7 is yes after documenting the maximum known or reasonably suspected concentration of key contaminants discharged above the groundwater level and if there is evidence that the concentrations are increasing and provide a statement of professional judgment supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.
	If no – continue after documenting the maximum known or reasonably suspected concentration of each contaminant discharged above its groundwater level and if there is evidence that the concentrations are increasing.
	If unknown – enter "IN" status code in #8.
6.	Can the discharge of contaminated groundwater into surface water be shown to be currently acceptable to continue until a final remedy decision can be made and implemented?
	If yes – continue after either identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria developed for the protection of the site's surface water, sediments, and eco-systems.
	If no – skip to #8 and enter "NO" status code after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.
	If unknown – skip to #8 and enter "IN" status code.

# Page 6 Exide Technologies CA750

7.	Will groundwater monitoring data be collected in the future to verify that contaminated groundwater has remained within the dimensions of the existing area of contaminated groundwater?
	If yes – continue after providing or citing documentation for planned activities or future sampling events. Specifically identify the well locations which will be tested in the future to verify the expectation that groundwater contamination will not be migrating beyond the existing area of groundwater contamination.
	If no – enter "NO" status code in #8.
	If unknown – enter "IN" status code in #8>
8.	Check the appropriate RCRIS status code for the Migration of Contaminated Groundwater Under Control EI (CA750) and obtain Supervisor signature and date on the EI determination below.
	X YE – Yes, Migration of Contaminated Groundwater Under Control has been verified. Based on a review of the information contained in this EI determination, it has been determined that the migration of contaminated groundwater is under control at the Exide Technologies facility (IAD069619765), located at 913 South 10 <sup>th</sup> Street, Manchester, Iowa. Specifically, this determination indicates that the migration of contaminated groundwater is under control and that monitoring has been conducted verifying this fact.
	NO – Unacceptable migration of contaminated groundwater is observed or expected at this facility.
	IN – More information is needed to make a determination.

# Page 7 Exide Technologies CA750

Completed by:

(Signature and Date)

Harry V. Gabbert

Project Manager, RCRA Corrective Action & Permits Branch

Slegget 5/26/09

**EPA Region VII** 

Supervisor:

Lynn Slugantz

Chief, RCRA Corrective Action & Permits Branch

**EPA Region VII** 

Locations Where References May Be Found:

EPA Region VII RCRA Records Center 901 N. 5<sup>th</sup> Street Kansas City, Kansas 66101

Contact Telephone Number and e-mail Address:

Harry Gabbert (913) 551-7652 Gabbert.harry@epa.gov

#### **FIGURES**

Figure 1. Site Location

Figure 2. Site Plan

Figure 3. Post-Closure Monitoring Well Network

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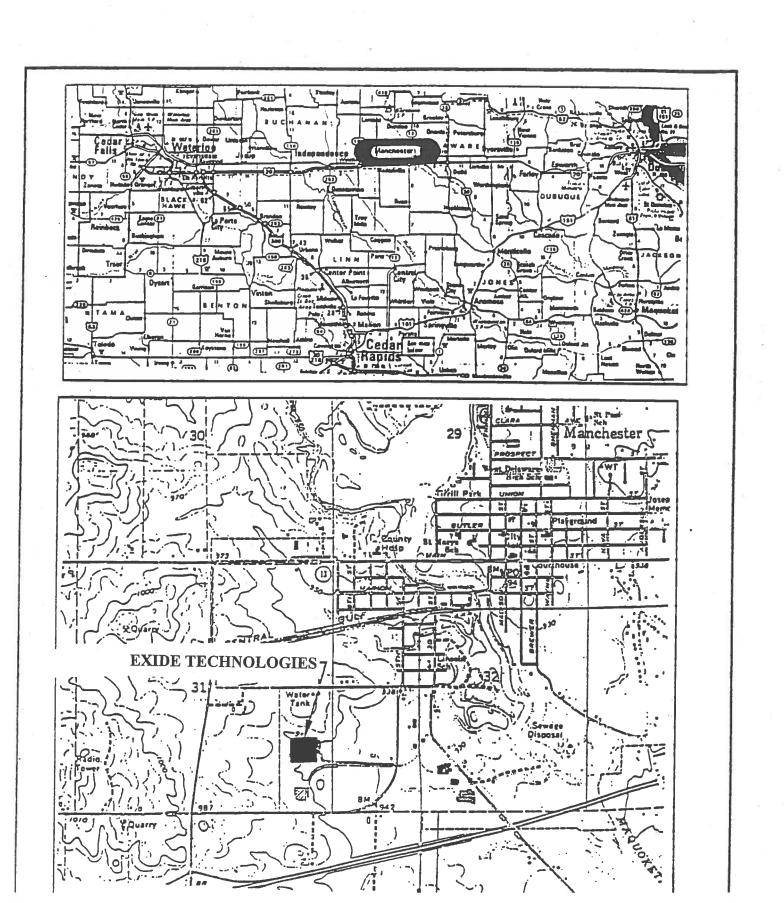
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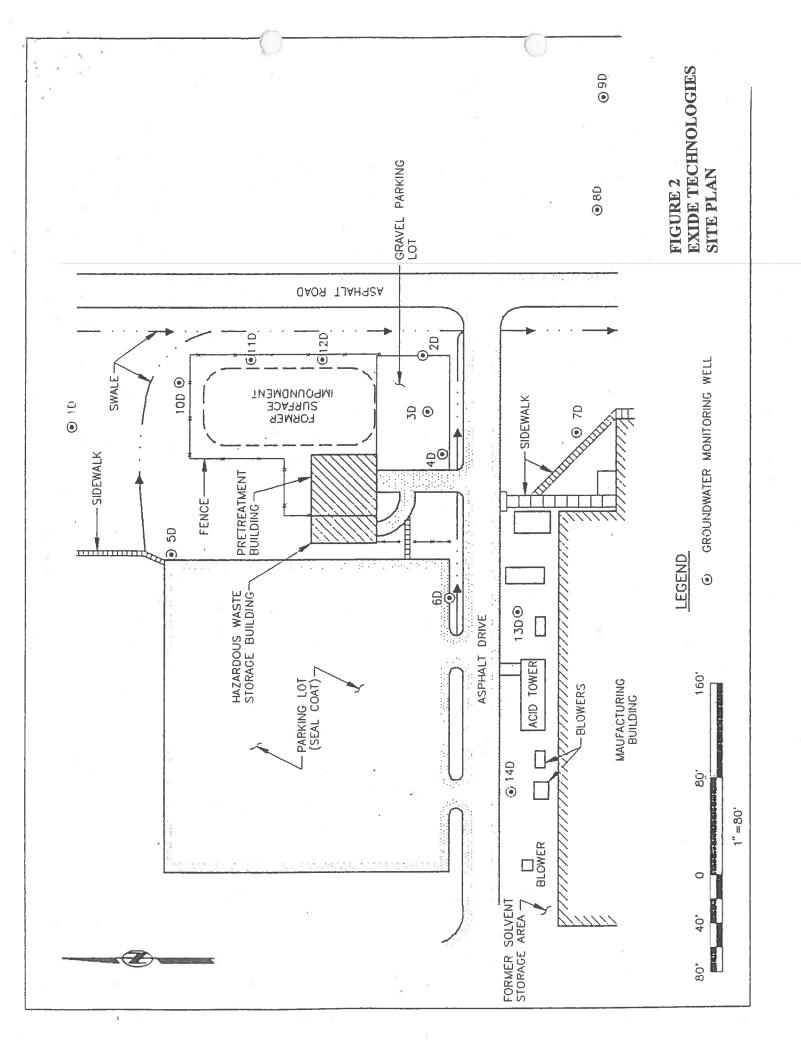
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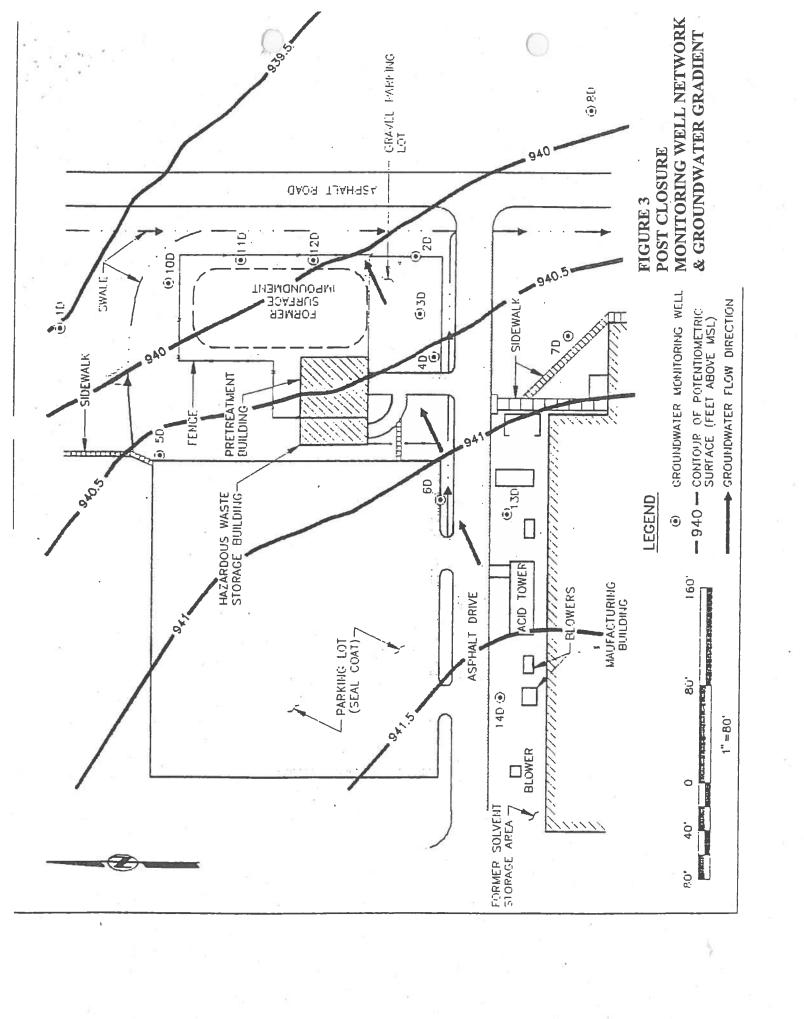
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FIGURE 1
EXIDE TECHNOLOGIES LOCATION MAP





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#### **Documentation of Environmental Indicator Determination**

#### Final 4/1/09

## RCRA Corrective Action Environmental Indicator (EI) RCRIS Code (CA725)

#### **Current Human Exposures Under Control**

Facility Name:

Exide Technologies (Formerly General Battery)

Facility Address: 913 South 10th Street

Manchester, Iowa 52057

Facility EPA ID#: IAD069619765

releases to soil, groundwater, surface water/sediments, and air, subject to RC Corrective Action from Solid Waste Management Units (SWMU), Regulate and Areas of Concern (AOC), been considered in this EI determination?			
	<u>X</u>	If yes, check here and continue with #2 below.	
		If no, re-evaluate existing data, or	
	-	If data are not available skip to #6 and enter "IN" (more information needed) status code.	

#### Facility Location, Physical Setting and Regulatory History

Exide Technologies (Exide), a manufacturer of lead-acid batteries, is located at 913 South 10<sup>th</sup> Street, Manchester, Iowa (Figure 1). The site was formerly owned and operated as Prestolite Battery, Allied Battery and General Battery, respectively. The facility has been regulated as an interim status hazardous waste and storage facility by virtue of Prestolite Battery's initial filing for a RCRA Hazardous Waste Permit on November 11, 1980. On January 16, 1987, the Exide facility submitted a Closure Plan for the closure of four units. The four units were a Lead Storage Area, Waste Solvent Storage Area, Former Waste Storage Area, and a Surface Impoundment (Figure 2). The Closure Plan was posted for public notice on May 23, 1987 and final approval of the plan was granted by EPA on June 29, 1987. Closure activities for the units, which included environmental sampling for sulfate, pH, sodium, and lead contamination, were performed from May 2 through October 13, 1988. Closure certification reports were submitted to EPA on December 23, 1988 and February 2, 1989, documenting the results of the closure activities and indicating that no further action was necessary.

### Page 2 Exide Technologies CA725

On September 25, 1989, EPA concluded that all of the units had been closed in accordance with the approved Closure Plan except for the Surface Impoundment. EPA determined that time-of-travel groundwater monitoring was needed in order to accept the closure certification of the Surface Impoundment. Additional groundwater monitoring wells were installed and a semi-annual groundwater monitoring program was initiated (Figure 3).

Quarterly groundwater monitoring for over seven years did not detect any hazardous waste or hazardous waste constituents in any onsite monitoring wells. Lead levels in groundwater and soil sampling from the former surface impoundment were below MCLs and equal to or below reported background levels. Closure Certification was accepted by EPA June14, 1993. After a public comment period, EPA terminated Exide's interim status with no further corrective action.

Other than the units that underwent closure as discussed above, other areas of the plant initially investigated in 1986 and discussed in the January, 1987 Corrective Action Plan, included the waste water treatment plant (WWTP), satellite scrap accumulation barrels, sludge sumps, handling of spent methylene chloride from gluing operations and waste oil collections. Air emission control features such as baghouse dust accumulation drums and a wet scrubber were also investigated for potential hazardous waste releases to the environment and addressed in the 1987 Corrective Action Plan.

There is no evidence of releases to the environment from these other plant waste handling operations. Discharge from the WWTP is continuous and under a NPDES Permit. Satellite accumulation drums for scrap metal and sump sludge collection are periodically sent offsite to a smelter for recycling. Baghouse dust is accumulated in barrels below the baghouses and sent offsite to be reclaimed. Effluent from the wet scrubber is discharged to the WWTP while spent methylene chloride left over from battery case gluing operations is being sent to the Hydrite Chemical Company for recycling use. Waste oil is periodically drummed and sent offsite for incineration.

#### BACKGROUND

#### **Definition of Environmental Indicators for RCRA Corrective Action**

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures such as reports received, to track changes in the quality of the environment. The EI CA725 evaluated in this determination indicate the quality of the environment in relation to current human exposures to contamination.

# Page 3 Exide Technologies CA725

#### Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no unacceptable human exposures to contamination in concentrations in excess of appropriate risk-based levels, that can be reasonably expected under current land- and groundwater-use conditions onsite.

#### Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program, the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Result Act of 1993 (GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions only, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action Program's overall mission to protect human health and the environment requires that Final remedies address the issues of potential future human exposure scenarios, future land and groundwater uses, and ecological receptors.

## **Duration Applicability of EI Determinations**

EI determination status codes should remain in RCRIS national database only as long as they remain true. RCRIS status codes must be changed when the regulatory authorities become aware of contrary information.

2. Are groundwater, soil, surface water, sediments, or air media known or reasonably suspected to be contaminated above appropriately protective risk-based levels such as Maximum Contaminant Levels (MCLs) which is the maximum permissible level of a contaminant in water delivered to any user of a public water system under the Safe Drinking Water Act, from releases subject to RCRA Corrective Action from any onsite SWMUs, RUs or AOCs?

	Yes	No	Rationale/Key Contaminants
Groundwater Air (Indoor) Surface Soil Surface Water		X X X X	

# Page 4 Exide Technologies CA725

Sedim	
	rface Soil X
Outdo	or Air X
	If no for all media, skip to #6 and enter "YE" status code after providing or citing priate levels and referencing sufficient supporting documentation demonstrating that these are not exceeded.
mediu	If yes for any media, continue after identifying key contaminants in each contaminated m, citing appropriate levels and referencing supporting documentation.
2	If unknown for any media, skip to #6 and enter "IN" status code.
3.	Are there complete pathways between contamination and human receptors such that exposures can be reasonably expected under the current land and groundwater use conditions?
	_ If no pathways are complete, skip to #6 and enter "YE" status code.
W 600	_ If yes for complete pathways present for any contaminated media, continue evaluation.
	_ If unknown, skip to #6 and enter "IN" status code.
4.	Can exposures from any of the complete pathways identified in #3 be reasonably expected to be significant?
	If no for any complete exposure pathway, skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures are not expected to be significant.

# Page 5 Exide Technologies CA725

	and explaining and/or referencing documentation justifying why the exposures are not expected to be significant.
	If unknown, skip to #6 and enter "IN" status code.
5.	Can the significant exposures identified in #4 be shown to be within acceptable limits?
	If yes, continue and enter "YE" after summarizing and referencing documentation justifying why all significant exposures to contamination are within acceptable limits.
	If no, continue and enter "NO" status code after providing a description of each potentially unacceptable exposure.
	If unknown, continue and enter "IN" status code
6.	Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate manager) signature and date on the EI determination below and attach appropriate supporting documentation as well as a map of the facility.
	X YE – Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI determination, "Current Human Exposures" are expected to be "Under Control" at the Exide Technologies facility (formerly General Battery), EPA ID# IAD069619765, located at 913 South 10 <sup>th</sup> Street, Manchester, Iowa under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes in the facility.
	NO – "Current Human Exposures" are not under control.
	IN – More information is needed to make a determination.

#### Exide Technologies CA725

Completed by:

(Signature and Date)

Harry V. Gabbert

Project Manager, RCRA Corrective Action & Permits Branch

EPA Region VII

Supervisor:

Jum M Slengert 5/36/09

Lynn Slugantz,

Chief, RCRA Corrective Action & Permits Branch

**EPA Region VII** 

Locations where References may be found:

EPA Region VII RCRA Records Center 901 N. 5<sup>th</sup> Street Kansas City, Kansas 66101

Contact telephone number and e-mail address:

Harry Gabbert (913) 551-7652 gabbert.harry@epa.gov

Final Note: The Human Exposures EI is a qualitative screening of exposures and the determinations within this document should not be used as the sole basis for restricting the scope of more detailed, site-specific, assessments of risk.

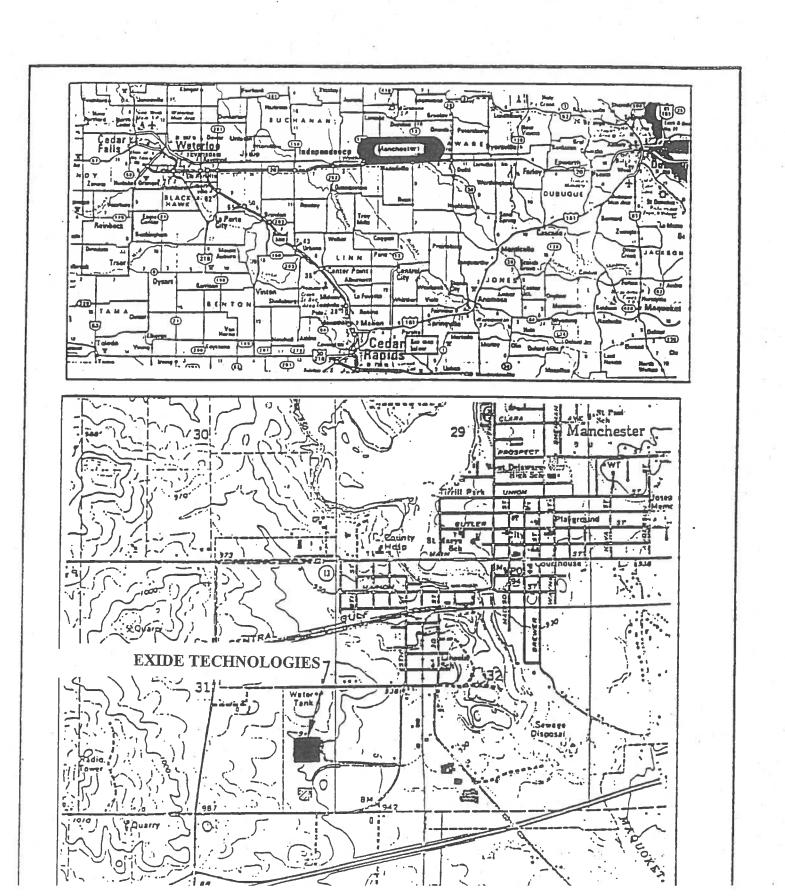
## FIGURES (Attached)

Figure 1. Site Location

Figure 2. Site Plan

Figure 3. Post-Closure Monitoring Well Network

FIGURE 1
EXIDE TECHNOLOGIES LOCATION MAP



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